

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
RHONDA HALL,)	
)	CIVIL ACTION NO. 05-30002-MAP
Plaintiff,)	
v.)	
)	
VERIZON COMMUNICATIONS, INC. and)	
VERIZON NEW ENGLAND, INC.)	
)	
Defendants.)	AUGUST 18, 2006
_____)	

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Defendants, Verizon Communications, Inc. and Verizon New England, Inc. (“Verizon”), respectfully seek summary judgment on each count of Plaintiff’s Complaint because (1) Plaintiff has not adduced evidence from which a reasonable fact-finder could infer that Verizon subjected her to a hostile work environment, and in any event, the undisputed facts reveal that Verizon investigated and remedied the workplace conduct about which Plaintiff complained; (2) Plaintiff cannot point to any evidence to support her claim of retaliation; (3) Plaintiff does not satisfy the definition of an individual with a disability under state or federal law; and (4) Plaintiff rejected Verizon’s offer of reasonable accommodation of her alleged disability. Accordingly, Plaintiff cannot, as a matter of law, prevail on any of her claims, and summary judgment should enter in favor of Verizon.

For these reasons, set out in full in the accompanying Memorandum of Law, Plaintiff’s claims fail as a matter of law, and Verizon is entitled to summary judgment on each count of Plaintiff’s Complaint.

Respectfully submitted,

DEFENDANTS,
VERIZON COMMUNICATIONS, INC. and
VERIZON NEW ENGLAND, INC.

By /s/ Stacy Smith Walsh

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2006, a copy of foregoing **Defendants' Motion for Summary Judgment** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

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